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October 9, 2024

Via CM/ECF

Magistrate Judge Katharine H. Parker
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *UrthTech LLC v. GOJO Industries, Inc.*
Case No. 1:22-cv-06727-PKC (S.D.N.Y.)

Dear Judge Parker:

As directed by the Court's Scheduling Order dated September 23, 2024 (Dkt. 98), the parties exchanged preliminary lists of deposition witnesses, Rule 30(b)(6) topics, document custodians, and ESI search terms on October 1, 2024, and the parties jointly submit this letter to advise the Court of any outstanding discovery issues.

Following the exchange of information on October 1, counsel for the parties corresponded by email, and met and conferred by telephone conference on October 9, to address the parties' disputes regarding the search and production of documents and information included in the parties' privilege logs.

The parties agreed to attempt to resolve their disputes concerning document production by exchanging proposed reasonable and limited additional ESI search terms for each party to use to search for additional responsive documents. Counsel agreed to work in good faith to reach agreement on supplemental ESI search terms for each party to run that would avoid imposing an undue burden on the party, and also avoid the need for the Court's intervention to resolve these issues.

The parties' dispute concerning UrthTech's objections to GOJO's requests for admission is also outstanding and was previously briefed by the parties. *See* Dkt. 99, 101.

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In view of the remaining discovery disputes, the parties also intend to meet and confer regarding the discovery schedule and if needed may jointly request an extension of the deadline for the close of fact discovery.

Respectfully submitted,

By: /s/ Michael R Weiner

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